New-Indy Catawba LLC
P.O. Box 7
5300 Cureton Ferry Road
Catawba, SC 29704
T 803-981-8000
New-indycb.com

April 5, 2021

Katharine K. Buckner
Sandhills Permitting Section
Bureau of Air Quality – Air Permitting Division
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Re: Title V Operating Permit TV-2440-0005 Modification Request
Incorporation of Construction Permit 2440-0005-DF
New-Indy Catawba LLC
Catawba, South Carolina 29704

Dear Ms. Buckner:

New-Indy Catawba LLC (New-Indy) has prepared this construction permit application to remove an obsolete legacy production limit related to the production of bleached paper products which are no longer manufactured at the Catawba Mill (Mill).

Introduction

New-Indy has recently converted the Mill from bleached paper grades (lightweight coated paper and market pulp) to manufacturing unbleached or brown paper (linerboard and market pulp). New-Indy refers to this investment as Project Columbia. Construction permit DF (c/p-DF) was issued for the project by the South Carolina Department of Health and Environmental Control (SCDHEC) in July 2019. The permit was updated in May 2020 to address the April 2020 addendum to the original June 2019 application.

This second addendum has been prepared to address the obsolete legacy kraft pulp production limit from c/p-DC condition 6.B.2 and TV-2440-0005 condition C.14. This second addendum does not address aspects of the project or c/p-DF that are not impacted by the obsolete kraft pulp production limit.

Project Description

The kraft pulp production is limited to 1,825 air dried tons unbleached pulp (ADTUBP) per day (12-month rolling average) in permit condition 6.B.2 of c/p-DC and condition C.14 of TV-2440-0005. This production limit is associated with producing kraft pulp suitable for manufacturing bleached paper grades at low kappa numbers (kappa ~30) prior to c/p-DF (the kappa number indicates the "harshness" of the cook). Following the conversion of the Fiberline to pulp suitable for linerboard and unbleached paper grades (kappa > 90) under c/p-DF, the c/p-DC production limit is now obsolete.

A summary of the production rates and emissions used for permitting c/p-DC and c/p-DF is presented in the table below:

Construction Permit ID			
Construction Permit	DC	DF	DF
Application Date	March 2011	June 2019	April 2020
Digester kappa before project	28	~30	~30
Digester kappa after project	32	>90	>90
Kraft Pulp Production (ADTUBP/day)			
Baseline	1,532.5	1,542.9	1,520.0
Could Have Accommodated	1,704.9	Not Used	Not Used
Projected	1,825.0	[redacted]	
Emissions Increase from Project (tons/year)			
TSP	0.1	5.0	0.5
PM_{10}	0.1	1.2	(11.4)
$PM_{2.5}$	0.1	(1.5)	(11.0)
SO_2	124.8*	(9.2)	(1,262.6)
NO_X	15.8	(54.8)	(263.2)
CO	24.1	(256.1)	(264.2)
VOC	14.7	(10.8)	39.5
TRS	1.8	8.3	6.9
H_2S	< 1.8	(0.1)	2.2
CO_2e	621	(55,535)	(55,428)

*PSD permit required for SO_2.

The kappa was increased slightly under c/p-DC to produce more kraft pulp suitable for manufacturing bleached coated paper grades and market pulp. The c/p-DC kraft pulp production increased approximately 120 ADTUBP/day and resulted in SO_2 emissions increasing 124.8 tons per year. The SO_2 emissions increase from c/p-DC required a Prevention of Significant Deterioration (PSD) construction permit for SO_2 that included a production limit of 1,825 ADTUBP/day as the basis of the permitted SO_2 emissions increase for that project.

The kappa was increased substantially under c/p-DF and other changes were required to produce kraft pulp suitable for unbleached linerboard grades and unbleached market pulp. Although the c/p-DF baseline kraft pulp production is nearly identical c/p-DC, the permitted production increased over [redacted]

ADTUBP/day while the SO_2 emissions have significantly decreased. PSD construction permitting was not required for c/p-DF and kraft pulp production limits are no longer necessary.

Emissions Calculations

There are no changes to the emissions calculations presented in the June 2019 application and the April 2020 addendum to c/p-DF.

Regulatory Applicability

There are no changes to the regulatory applicability presented in the June 2019 application and the April 2020 addendum to c/p-DF.

Summary

As discussed in the June 2019 application and April 2020 addendum, there is no reasonable possibility of New-Indy having a significant emissions increase of any PSD pollutant following the conversion to unbleached paper grades. Therefore, consistent with the USEPA New Source Review Policy Memorandum dated December 7, 2017[1], no production limits are required because PSD permitting requirements are not applicable to c/p-DF. The legacy kraft pulp production limit in c/p-DC is now obsolete following the conversion to manufacturing unbleached paper grades and the reduction in SO_2 emissions. With this application we are formally requesting removal of the 1,825 ADTUBP per day production limit.

If you have any questions regarding this application please contact me at (803) 981-8010.

Sincerely,

Daniel Mallett
Environmental Manager

1 https://www.epa.gov/sites/production/files/2017-12/documents/nsr_policy_memo.12.7.17.pdf

Bureau of Air Quality
Expedited Review Request Instructions
Construction Permits

APPLICATION IDENTIFICATION		
Facility Name *(This should be the name used to identify the facility)* New-Indy Catawba LLC	SC Air Permit Number (8-digits only) *(Leave blank if one has never been assigned)* 2440 - 0005	Request Date April 5, 2021

PRIMARY AIR PERMIT CONTACT			
Title/Position: Environmental Manager	Mr.	First Name: Dan	Last Name: Mallett
E-mail Address: dan.mallett@new-indycb.com		Phone No.: (803) 981-8010	Cell No.: ( ) -

SECONDARY AIR PERMIT CONTACT *(If the Department is unable to contact the primary air permit contact please provided a secondary contact.)*			
Title/Position:		First Name:	Last Name:
E-mail Address:		Phone No.:	Cell No.: ( ) -

Check One	Permit Type	Expedited Review Days*	Fee**
☒	Minor Source Construction Permit	30	$3,000
☐	Synthetic Minor Construction Permit	65	$4,000
☐	Prevention of Significant Deterioration (PSD) not impacting a Class I Area (no Class I modeling required)	120	$20,000
☐	Prevention of Significant Deterioration (PSD) Modification not impacting a Class I Area (no Class I modeling required) No BACT limit change but requires Public Notice	120	$5,000
☐	Prevention of Significant Deterioration (PSD) Modification not impacting a Class I Area (no Class I modeling required) Number of BACT Pollutants ☐ X $5,000 per BACT modification	120	Total Fee $ Maximum of $20,000
☐	Prevention of Significant Deterioration (PSD) impacting a Class I Area (Class I modeling required)	150	$25,000
☐	Prevention of Significant Deterioration (PSD) Modification impacting a Class I Area (Class I modeling required) No BACT limit change but requires Public Notice	150	$5,000
☐	Prevention of Significant Deterioration (PSD) Modification impacting a Class I Area (Class I modeling required) Number of BACT Pollutants ☐ X $5,000 per BACT modification	150	Total Fee $ Maximum of $25,000
☐	**Concrete** Minor Source Construction Permit Relocation Request	10	$1,500
☐	**Asphalt** Synthetic Minor Construction Permit Relocation Request	15	$3,500

*All days above are calendar days, but exclude State holidays, and building closure dates due to severe weather or other emergencies. Expedited days for asphalt and concrete also exclude weekends.
****DO NOT SEND PAYMENT UNTIL THE APPLICATION HAS BEEN ACCEPTED INTO THE EXPEDITED PROGRAM**. If chosen for expedited review, you will be notified by phone for verbal acceptance into the program. Fees must be paid within five business days of acceptance.

PRIMARY AIR PERMIT CONTACT SIGNATURE
I have read the most recent version of the Expedited Review Program Standard Operating Procedures and accept all of the terms and conditions within. I understand that it is my responsibility to ensure an application of the highest quality is submitted in a timely manner, and to address any requests for additional information by the deadline specified. I understand that submittal of this request form is not a guarantee that expedited review will be granted.

Signature of Primary Air Permit Contact Date

Bureau of Air Quality
Construction Permit Application
Facility Information
Page 1 of 3

FACILITY IDENTIFICATION	
SC Air Permit Number (8-digits only) *(Leave blank if one has never been assigned)* 2440 - 0005	Application Date April 5, 2021
Facility Name *(This should be the name used to identify the facility at the physical address listed below)* New-Indy Catawba LLC	Facility Federal Tax Identification Number *(Established by the U.S. Internal Revenue Service to identify a business entity)* 83-1904423

FACILITY PHYSICAL ADDRESS		
Physical Address: 5300 Cureton Ferry Road		County: York
City: Catawba	State: SC	Zip Code: 29704
Facility Coordinates *(Facility coordinates should be based at the front door or main entrance of the facility.)*		
Latitude: 34°50'37"N	Longitude: 80°53'25"W	☐ NAD27 *(North American Datum of 1927)* Or ☒ NAD83 *(North American Datum of 1983)*

CO-LOCATION DETERMINATION
Are there other facilities in close proximity that could be considered co-located? ☒ No ☐ Yes*
List potential co-located facilities, including air permit numbers if applicable:

**If yes, please submit co-location applicability determination details in an attachment to this application.*

COMMUNITY OUTREACH
What are the potential air issues and community concerns? Please provide a brief description of potential air issues and community concerns about the entire facility and/or specific project. Include how these issues and concerns are being addressed, if the community has been informed of the proposed construction project, and if so, how they have been informed. No issues or concerns related to removing the obsolete legacy production limit. Other community concerns regarding odor complaints are being addressed with regulatory agencies and the communities.

FACILITY'S PRODUCTS / SERVICES	
Primary Products / Services *(List the primary product and/or service)* Linerboard/Pulp Manufacturing	
Primary SIC Code *(Standard Industrial Classification Codes)* 2631	Primary NAICS Code *(North American Industry Classification System)* 322130
Other Products / Services *(List any other products and/or services)*	
Other SIC Code(s): 2611, 2621	Other NAICS Code(s): 322110, 322121

Bureau of Air Quality
Construction Permit Application
Facility Information

AIR PERMIT FACILITY CONTACT *(Person at the facility who can answer technical questions about the facility and permit application.)*			
Title/Position: Environmental Manager	Salutation: Mr.	First Name: Dan	Last Name: Mallett
Mailing Address: PO Box 7			
City: Catawba		State: SC	Zip Code: 29704
E-mail Address: dan.mallett@new-indycb.com		Phone No.: (803) 981-8010	Cell No.:
The signed permit will be e-mailed to the designated Air Permit Contact. If additional individuals need copies of the permit, please provide their names and e-mail addresses.			
Name		**E-mail Address**	
Steven Moore		steven.moore@all4inc.com	

CONFIDENTIAL INFORMATION / DATA
Does this application contain confidential information or data? ☐ No ☒ Yes*

If yes, include a sanitized version of the application for public review and **ONLY ONE COPY OF CONFIDENTIAL INFORMATION SHOULD BE SUBMITTED*

LIST OF FORMS INCLUDED *(Identify all forms included in the application package)*	
Form Name	**Included (Y/N)**
Expedited Review Request (DHEC Form 2212)	☒ Yes ☐ No
Equipment/Processes (DHEC Form 2567)	☒ Yes
Emissions (DHEC Form 2569)	☒ Yes
Regulatory Review (DHEC Form 2570)	☒ Yes
Emissions Point Information (DHEC Form 2573)	☒ Yes ☐ No (If No, Explain)

OWNER OR OPERATOR			
Title/Position: Technical Manager	Salutation: Mr.	First Name: Charles	Last Name: Cleveland
Mailing Address: PO Box 7			
City: Catawba		State: SC	Zip Code: 29704
E-mail Address: pete.cleveland@new-indycb.com		Phone No.: 803-981-8206	Cell No.:
OWNER OR OPERATOR SIGNATURE			
I certify, to the best of my knowledge and belief, that no applicable standards and/or regulations will be contravened or violated. I certify that any application form, report, or compliance certification submitted in this permit application is true, accurate, and complete based on information and belief formed after reasonable inquiry. I understand that any statements and/or descriptions, which are found to be incorrect, may result in the immediate revocation of any permit issued for this application.			

Signature of Owner or Operator Date

PERSON AND/OR FIRM THAT PREPARED THIS APPLICATION

Bureau of Air Quality
Construction Permit Application
Facility Information
Page 3 of 3

PROFESSIONAL ENGINEER INFORMATION			
Consulting Firm Name: ALL4			
Title/Position: PE	Salutation: Ms.	First Name: Amy	Last Name: Marshall
Mailing Address: 630 Davis Drive, Suite 220			
City: Durham		State: NC	Zip Code: 27560
E-mail Address: amarshall@all4inc.com		Phone No.: (984) 777-3073	Cell No.:
SC License/Registration No.: 22147			
PROFESSIONAL ENGINEER SIGNATURE			
I have placed my signature and seal on the engineering documents submitted, signifying that I have reviewed this construction permit application as it pertains to the requirements of *South Carolina Regulation 61-62, Air Pollution Control Regulations and Standards*.			

SOUTH CAROLINA REGISTERED PROFESSIONAL ENGINEER No. 22147 AMY M. MARSHALL

Amy M. Marshall 3/25/2021

Signature of Professional Engineer Date

Bureau of Air Quality
Construction Permit Application
Equipment / Processes
Page 1 of 2

APPLICATION IDENTIFICATION *(Please ensure that the information list in this table is the same on all of the forms and required information submitted in this construction permit application package.)*		
Facility Name *(This should be the name used to identify the facility)* New-Indy Catawba LLC	SC Air Permit Number (8-digits only) *(Leave blank if one has never been assigned)* 2440 - 0005	Application Date April 5, 2021

PROJECT DESCRIPTION
Brief Project Description (What, why, how, etc.): Remove obsolete legacy kraft pulp production limit.

ATTACHMENTS	
☐ Process Flow Diagram	Location in Application: See June 2019 Application and April 2020 Addendum
☐ Detailed Project Description	Location in Application: See June 2019 Application and April 2020 Addendum

EQUIPMENT / PROCESS INFORMATION

Equipment ID Process ID	Action	Equipment / Process Description	Maximum Design Capacity (Units)	Control Device ID(s)	Pollutants Controlled (Include CAS#)	Capture System Efficiency and Description	Emission Point ID(s)
5210 - 5255	☐ Add ☐ Remove ☐ Modify ☒ Other	Kraft Pulp Mill (Continuous Digester System, Turpentine Recovery System, Pulp Washing System, Pulp Refining and Washing)	[redacted]	5260, 5260C, 5270, 2605, 3705	VOC, HAPs, TRS	LVHC Collection System, LVHC System Caustic Scrubber, HVLC Collection System	2610S1, 2610S2
	☐ Add ☐ Remove ☐ Modify ☐ Other						
	☐ Add ☐ Remove ☐ Modify ☐ Other						

CONTROL DEVICE INFORMATION					
Control Device ID	Action	Control Device Description	Maximum Design Capacity (Units)	Inherent/Required/Voluntary (Explain)	Destruction/Removal Efficiency Determination
5260, 5260C, 5270, 2605, 3705	☐ Add ☐ Remove ☐ Modify ☒ Other	See June 2019 Application and April 2020 Addendum			
	☐ Add ☐ Remove ☐ Modify ☐ Other				
	☐ Add ☐ Remove ☐ Modify ☐ Other				

RAW MATERIAL AND PRODUCT INFORMATION			
Equipment ID Process ID Control Device ID	Raw Material(s)	Product(s)	Fuels Combusted
5210-5255	Wood, cooking liquor	Unbleached pulp	none

MONITORING AND REPORTING INFORMATION					
Equipment ID Process ID Control Device ID	Pollutant(s)/Parameter(s) Monitored	Monitoring Frequency	Reporting Frequency	Monitoring/Reporting Basis	Averaging Period(s)
5210-5255	See June 2019 Application and April 2020 Addendum				

Bureau of Air Quality
Construction Permit Application
Emissions

APPLICATION IDENTIFICATION *(Please ensure that the information list in this table is the same on all of the forms and required information submitted in this construction permit application package.)*		
Facility Name *(This should be the name used to identify the facility)* New-Indy Catawba LLC	SC Air Permit Number (8-digits only) *(Leave blank if one has never been assigned)* 2440 - 0005	Application Date April 5, 2021

ATTACHMENTS *(Check all the appropriate checkboxes if included as an attachment)*	
☐ Sample Calculations, Emission Factors Used, etc. See June 2019 and April 2020 Permit Applications	☐ Detailed Explanation of Assumptions, Bottlenecks, etc. See June 2019 and April 2020 Permit Applications
☐ Supporting Information: Manufacturer's Data, etc. See June 2019 and April 2020 Permit Applications	☐ Source Test Information See June 2019 and April 2020 Permit Applications
☒ Details on Limits Being Taken for PTE Emissions See project description for discussion of removing obsolete legacy production limit.	☒ NSR Analysis See project description for discussion of removing obsolete legacy production limit.

SUMMARY OF PROJECTED CHANGE IN FACILITY WIDE POTENTIAL EMISSIONS
(Calculated at maximum design capacity.)

Pollutants	**Emission Rates Prior to Construction / Modification (tons/year)**			**Emission Rates After Construction / Modification (tons/year)**		
	Uncontrolled	**Controlled**	**PTE**	**Uncontrolled**	**Controlled**	**PTE**
Particulate Matter (PM)	See June 2019 and April 2020 Permit Applications					
Particulate Matter <10 Microns (PM_{10})						
Particulate Matter <2.5 Microns ($PM_{2.5}$)						
Sulfur Dioxide (SO_2)						
Nitrogen Oxides (NO_x)						
Carbon Monoxide (CO)						
Volatile Organic Compounds (VOC)						
Lead (Pb)						
Highest HAP Prior to Construction (CAS #: 67561)						
Highest HAP After Construction (CAS #: 67561)						

Bureau of Air Quality
Construction Permit Application
Emissions

SUMMARY OF PROJECTED CHANGE IN FACILITY WIDE POTENTIAL EMISSIONS (Calculated at maximum design capacity.)						
Pollutants	**Emission Rates Prior to Construction / Modification (tons/year)**			**Emission Rates After Construction / Modification (tons/year)**		
	Uncontrolled	**Controlled**	**PTE**	**Uncontrolled**	**Controlled**	**PTE**
Total HAP Emissions*						

Include emissions from exempt equipment and emission increases from process changes that were exempt from construction permits.
(*All HAP emitted from the various equipment or processes must be listed in the appropriate "Potential Emission Rates at Maximum Design Capacity" Table)

POTENTIAL EMISSION RATES AT MAXIMUM DESIGN CAPACITY											
Equipment ID / Process ID	**Emission Point ID**	**Pollutants** (Include CAS #)	**Calculation Methods / Limits Taken / Other Comments**	**Uncontrolled**		**Controlled**		**PTE**	
				lbs/hr	**tons/yr**	**lbs/hr**	**tons/yr**	**lbs/hr**	**tons/yr**
5210-5255	ALL	ALL	See June 2019 and April 2020 Permit Applications						

Bureau of Air Quality
Construction Permit Application
Regulatory Review

APPLICATION IDENTIFICATION *(Please ensure that the information list in this table is the same on all of the forms and required information submitted in this construction permit application package.)*		
Facility Name *(This should be the name used to identify the facility)* New-Indy Catawba LLC	SC Air Permit Number (8-digits only) *(Leave blank if one has never been assigned)* 2440 - 0005	Application Date April 5, 2021

STATE AND FEDERAL AIR POLLUTION CONTROL REGULATIONS AND STANDARDS *(If not listed below add any additional regulations that are triggered.)*					
Regulation	**Applicable**		**Include all limits, work practices, monitoring, record keeping, etc.**		
	Yes	**No**	**Explain Applicability Determination**	**List the specific limitations and/or requirements that apply.**	**How will compliance be demonstrated?**
Regulation 61-62.1, Section II(E) Synthetic Minor Construction Permits	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.1, Section II(G) Conditional Major Operating Permits	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.5, Standard No. 1 Emissions from Fuel Burning Operations	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.5, Standard No. 2 Ambient Air Quality Standards	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.5, Standard No. 3 Waste Combustion and Reduction	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.5, Standard No. 4 Emissions from Process Industries	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.5, Standard No. 5 Volatile Organic Compounds	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.5, Standard No. 5.2 Control of Oxides of Nitrogen	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.5, Standard No. 7 Prevention of Significant Deterioration*	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.5, Standard No. 7.1 Nonattainment New Source Review*	See June 2019 Application and April 2020 Addendum				

STATE AND FEDERAL AIR POLLUTION CONTROL REGULATIONS AND STANDARDS *(If not listed below add any additional regulations that are triggered.)*					
Regulation	**Applicable**		**Include all limits, work practices, monitoring, record keeping, etc.**		
	Yes	**No**	**Explain Applicability Determination**	**List the specific limitations and/or requirements that apply.**	**How will compliance be demonstrated?**
Regulation 61-62.5, Standard No. 8 Toxic Air Pollutants	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.6 Control of Fugitive Particulate Matter	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.68 Chemical Accident Prevention Provisions	See June 2019 Application and April 2020 Addendum				
Regulation 61-62.70 Title V Operating Permit Program	See June 2019 Application and April 2020 Addendum				
40 CFR Part 64 - Compliance Assurance Monitoring (CAM)	See June 2019 Application and April 2020 Addendum				
40 CFR 60 Subpart A - General Provisions	See June 2019 Application and April 2020 Addendum				
40 CFR 60 Subpart BB/BBa – Kraft Pulp Mill NSPS	See June 2019 Application and April 2020 Addendum				
40 CFR 61 Subpart A - General Provisions	See June 2019 Application and April 2020 Addendum				
40 CFR 63 Subpart A - General Provisions	See June 2019 Application and April 2020 Addendum				
40 CFR 63 Subpart S – Pulp and Paper MACT	See June 2019 Application and April 2020 Addendum				
Construction Permit DC – Condition 6.B.2	☐	☒	Obsolete legacy kraft pulp production limit no longer applies		
TV-2440-0005 – Condition C.14	☐	☒	Obsolete legacy kraft pulp production limit no longer applies		

* Green House Gas emissions must be quantified if these regulations are triggered.

A. APPLICATION IDENTIFICATION	
1. Facility Name: New-Indy Catawba LLC	
2. SC Air Permit Number (if known; 8-digits only): 2440 - 0005	3. Application Date: April 5, 2021
4. Project Description: Remove obsolete legacy kraft pulp production limit.	

B. FACILITY INFORMATION	
1. Is your company a Small Business? ☐ Yes ☒ No	2. If a Small Business or small government facility, is Bureau assistance being requested? ☐ Yes ☒ No
3. Are other facilities collocated for air compliance? ☐ Yes ☒ No	4. If Yes, provide permit numbers of collocated facilities:

C. AIR CONTACT			
Consulting Firm Name (if applicable):			
Title/Position: Environmental Manager	Salutation: Mr.	First Name: Daniel	Last Name: Mallett
Mailing Address: P.O. Box 7			
City: Catawba		State: SC	Zip Code: 29704
E-mail Address: dan.mallett@new-indycb.com		Phone No.: (803) 981-8010	Cell No.:

D. EMISSION POINT DISPERSION PARAMETERS
Source data requirements are based on the appropriate source classification. Each emission point is classified as a point, area, volume, or flare source. Contact the Bureau of Air Quality for clarification of data requirements. Include sources on a scaled site map. Also, a picture of area or volume sources would be helpful but is not required. A user generated document or spreadsheet may be substituted in lieu of this form provided all of the required emission point parameters are submitted in the same order, units, etc. as presented in these tables.
Abbreviations / Units of Measure: UTM = Universal Transverse Mercator; °N = Degrees North; °W = Degrees West; m = meters; AGL = Above Ground Level; ft = feet; ft/s = feet per second; ° = Degrees; °F = Degrees Fahrenheit

Bureau of Air Quality
Emission Point Information

E. POINT SOURCE DATA

(Point sources such as stacks, chimneys, exhaust fans, and vents.)

Emission Point ID	Description/Name	Point Source Coordinates Projection:				Release Height AGL (ft)	Temp. (°F)	Exit Velocity (ft/s)	Inside Diameter (ft)	Discharge Orientation	Rain Cap? (Y/N)	Distance To Nearest Property Boundary (ft)	Building		
		UTM E (m)	UTM N (m)	Lat (°N)	Long (°W)								Height (ft)	Length (ft)	Width (ft)
ALL	See June 2019 and April 2020 Permit Applications														

F. AREA SOURCE DATA

(Area sources such as storage piles, and other sources that have low level or ground level releases with no plumes.)

Emission Point ID	Description/Name	Area Source Coordinates Projection:				Release Height AGL (ft)	Easterly Length (ft)	Northerly Length (ft)	Angle From North (°)	Distance To Nearest Property Boundary (ft)
		UTM E (m)	UTM N (m)	Lat (°N)	Long (° W)					

G. VOLUME SOURCE DATA

(Volume sources such as building fugitives that have initial dispersion vertical depth prior to release.)

Emission Point ID	Description/Name	Volume Source Coordinates Projection:				Release Height AGL (ft)	Initial Horizontal Dimension (ft)	Initial Vertical Dimension (ft)	Distance To Nearest Property Boundary (ft)
		UTM E (m)	UTM N (m)	Lat (°N)	Long (° W)				

H. FLARE SOURCE DATA (Point sources where the combustion takes place at the tip of the stack.)											
Emission Point ID	Description/Name	Flare Source Coordinates Projection:				Release Height AGL (ft)	Heat Release Rate (BTU/hr)	Distance To Nearest Property Boundary (ft)	Building		
		UTM E (m)	UTM N (m)	Lat (°N)	Long (° W)				Height (ft)	Length (ft)	Width (ft)

I. AREA CIRCULAR SOURCE DATA								
Emission Point ID	Description/Name	Area Circular Source Coordinates Projection:				Release Height AGL (ft)	Radius of Area (ft)	Distance To Nearest Property Boundary (ft)
		UTM E (m)	UTM N (m)	Lat (°N)	Long (° W)			

J. AREA POLY SOURCE DATA					
Emission Point ID	Description/Name	Area Poly Source Coordinates Projection:		Release Height AGL (ft)	Number of Vertices
		UTM E (m)	UTM N (m)		

K. OPEN PIT SOURCE DATA								
Emission Point ID	Description/Name	Open Pit Source Coordinates Projection:		Release Height AGL (ft)	Easterly Length (ft)	Northerly Length (ft)	Volume (ft^3)	Angle From North (°)
		UTM E (m)	UTM N (m)					

K. OPEN PIT SOURCE DATA								
Emission Point ID	Description/Name	Open Pit Source Coordinates Projection:		Release Height AGL (ft)	Easterly Length (ft)	Northerly Length (ft)	Volume (ft^3)	Angle From North (^{o})
		UTM E (m)	UTM N (m)					

L. EMISSION RATES						
Emission Point ID	**Pollutant Name**	**CAS #**	**Emission Rate (lb/hr)**	**Same as Permitted (1)**	**Controlled or Uncontrolled**	**Averaging Period**
ALL	See June 2019 and April 2020 Permit Applications					
				☐ Yes ☐ No		
				☐ Yes ☐ No		

(1) Any difference between the rates used for permitting and the air compliance demonstration must be explained in the application report.